REMARKS

35 U.S.C. § 103 Rejection

Claims 1-17 are pending and at issue. Claim 17 is newly added.

Applicants respectfully traverse the rejection of claims 1, 2, 7-9, and 13-15 as obvious over Griffin et al. (U.S. Publication No. 2004/0063456) in view of Lesguillier et al. (U.S. Patent No. 6,727,804). As an initial matter, Applicants thank the Examiner for pointing out that the previous claim did not clearly recite a single device that communicates over all three communication mediums (i.e., a public telecommunication network via plain old telephone service (POTS), a wireless local area network, and a supply line). Accordingly, each of the pending claims is amended to specifically recite an electronic central unit adapted to communicate messages between a public telecommunication network and a power supply line or between a wireless peripheral device and a power supply line. Thus, the claims now positively recite all three communication mediums. Also, each of the pending claims is amended to recite that the electronic central unit is adapted to communicate over a public telecommunication network via plain old telephone service (POTS). As known by those skilled in the art, plain old telephone service connection specifically describes the wire-based, voice-grade telephone service connection common in most parts of the world and which is not a wireless connection.

Griffin et al. discloses a cell phone device 212 that is able to communicate over three **wireless** communication mediums: 1) a long-range cellular wireless network to another cell phone, 2) over a short range Bluetooth wireless network to a wireless earpiece 214, and 3) over a short range RF link to a module 234. The claimed system on the other hand recites a single device (the electronic central unit) having a first **wired** connection to a public telecommunication network via POTS and a second **wired** connection to a supply line. If the cell phone device 160 is considered to be the recited electronic central unit (which Applicants submit it is not), Griffin et al. fails to disclose that the cell phone device 160 is connected to at least one wired communication connection, much less with a public telecommunication network via POTS. Also, no other component or combination of components of Griffin et al. is connected to a telecommunication network via POTS.

Lesguiller et al. does not remedy the deficiency of Griffin et al. In particular, Lesguiller et al. discloses a transmitter that sends messages over a power supply line to a receiver. Griffin et al. discloses that its cell phone device 212 can be charged by coupling itself to module 234 which receives power over a supply line. Apparently, the Office proposes applying the Lesguiller et al. system to the power supply line provided to the combination of Griffin et al. devices 212 and 234 so that the combination (i.e., devices 212 and 234) is able to communicate over a supply line. If the combination of coupled devices is considered the recited electronic central unit (which Applicants submit it is not), the combination still fails to disclose a wired connection to a telecommunication network via POTS. For this reason alone, no combination of Griffin et al. and Lesguiller et al. render claims 1, 2, 7-9, and 13-15 obvious.

Moreover, no combination of Griffin et al. and Lesguiller et al. discloses or teaches providing data between a supply line communication and a second communication medium, much less between a supply line and a telecommunication network via POTS or between a supply line and a wireless local area network. Combining Griffin et al. and Lesguiller et al. (which Applicants submit is not taught) merely produces a device that is able to communicate over some wireless link and over a supply line. This is not the same as providing communication **between** a power supply line and a second medium (i.e., wireless network or POTS), nor is this communication trivial. For example, some routing process or translation process, such as that described in the present application, may be necessary to provide the connection and/or interoperability of data so that communications from a supply line can be provided on a wireless network or POTS, and vice versa, and this connection processing is simply not taught or even considered by either Griffin et al. or Lesguiller et al. For example, while Lesguiller et al. discloses a transmitter that sends messages over a power supply line to a receiver, Lesguiler et al. does not teach modifying its supply line communication system to include adapting its signals for or connecting its signals to a different communication medium (e.g., a wireless network). Because Griffin et al. does not even disclose power line communication, Griffin et al. also does not teach adapting its messages for input to a power supply line communication system.

Because neither Griffin et al. nor Lesguiller et al. discloses or teaches an electronic central unit adapted to communicate messages between a public

telecommunication network and a power supply line or between a wireless peripheral device and a power supply line, no combination of Griffin et al. and Lesguiller et al. renders claims 1, 2, 7-9, and 13-15 obvious.

Claims 3-6, 10, 11, 12, and 16 are rejected as being obvious over a combination of Griffin et al. and Lesguiller et al. in view of one of De Ruijter et al. (U.S. Publication No. 2005/0036568), Johnston et al. (U.S. 5,787,360), Folger et al. (U.S. Patent No. 5,337,044), or Watler et al. (U.S. Patent No. 6,836,655). Each of claims 3-6, 10, 11, 12 and 16 also recites an electronic central unit adapted to communicate messages between a public communication network and a power supply line or between a wireless peripheral device and a power supply line. As discussed above neither Griffen et al. nor Lesguiller et al. discloses or teaches providing a connection to a telecommunication network via POTS or cross communication between any of the recited three communication mediums. None of De Ruijter et al., Johnston et al., Lesguiller et al., or Watler et al. discloses the claimed limitations, nor are De Ruijter et al., Johnston et al., Folger et al., or Watler et al. cited for this purpose. It follows therefore, that no combination of Griffin et al., Lesguiller et al., De Ruijter et al, Johnston et al., Folger et al. and Watler et al. render claims 3-6, 10, 11, 23, and 16 obvious.

New claim 17 recites that an electronic central unit communicates over a public telecommunication network via plain old telephone service (POTS), a wireless local area network, and a supply line. Claim 17 further recites that the electronic central unit communicates messages received from one of the public telecommunication network via plain old telephone service (POTS), the wireless local area network, or the supply line and determines the intended destination of the received message. Upon determining the intended destination of the message, claim 17 recites that the message will be transmitted over another one of the public telecommunication network via plain old telephone service (POTS), the wireless local area network, or the supply line. As discussed above, none of the cited references discloses or teaches an electronic central unit adapted to communicate data between any two communication media of the set of communication media including a public telecommunication network via plain old telephone service (POTS), a wireless local area network, and a supply line. For this reason alone, claim 17 is not obvious in view of any combination of the cited references.

Claim 17 further recites that the electronic central unit determines an intended destination of a received alphanumeric message and transmits the message based on the determination. Even if the power line communication of Lesguiller et al. can be combined with the wireless communication system of Griffin et al. (which Applicants do not submit they can be), the combination still fails to disclose providing messages between a power supply line and a second non-power line communication. None of the other cited references remedies this deficiency. For this further reason, claim 17 is not obvious in view of Griffin et al. and Lesguiller et al.

Claim 17 further recites that the electronic central unit is adapted to communicate with a home automation device over an electronic supply cable using its interface module. More specifically, claim 17 recites generating a high frequency periodic signal corresponding to the message received by the electronic central unit for transmission to the home automation device over the electronic supply cable. None of the cited references discloses or teaches adapting a message for transmission to a home automation device via a supply line. For this further reason, claim 17 is not obvious over any combination of the cited references.

CONCLUSION

In view of the above amendment and arguments, Applicants submit the pending application is in condition for allowance and an early action so indicating is respectfully requested.

The Commissioner is authorized to charge any fee deficiency required by this paper, or credit any overpayment, to Deposit Account No. 13-2855.

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Respectfully submitted,

By: _____

Oliver T. Ong
Registration No.: 58,456
MARSHALL, GERSTEIN & BORUN LLP
233 S. Wacker Drive, Suite 6300
Sears Tower
Chicago, Illinois 60606-6357
(312) 474-6300
Attorneys for Applicants